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DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

08 CR 0546

BEN

UNITED STATES OF AMERICA,) Criminal Case No. _____
Plaintiff,) I N D I C T M E N T
v.) Title 8, U.S.C.,
JESUS ORTIZ (1),) Sec. 1324(a)(2)(B)(ii) -
ARTURO MORENO (2),) Bringing in Illegal Aliens for
Defendants.) Financial Gain; Title 8, U.S.C.,
) Sec. 1324(a)(2)(B)(iii) -
) Bringing in Illegal Aliens Without
) Presentation; Title 18, U.S.C.,
) Sec. 2 - Aiding and Abetting

The grand jury charges:

Count 1

On or about February 13, 2008, within the Southern District of California, defendants JESUS ORTIZ and ARTURO MORENO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Erik Esquivel Prado, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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WDK:fer:Imperial
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Count 2

On or about February 13, 2008, within the Southern District of California, defendants JESUS ORTIZ and ARTURO MORENO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Erik Esquivel Prado, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

Count 3

On or about February 13, 2008, within the Southern District of California, defendants JESUS ORTIZ and ARTURO MORENO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Veronica Perez Castilleja, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 4


On or about February 13, 2008, within the Southern District of California, defendants JESUS ORTIZ and ARTURO MORENO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Veronica Perez Castilleja, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

DATED: February 27, 2008.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By: 
DOUGLAS KEEHN
Assistant U.S. Attorney